

III.

On April 28, 2014, garnishee was not in possession of any effects belonging to Christopher Merhan and/or his spouse Amanda Merhan.

IV.

Garnishee is not aware of any other entity owing any debts to Christopher Merhan and/or his spouse Amanda Merhan, or possessing effects belonging to Christopher Merhan and/or his spouse Amanda Merhan.

WHEREFORE, Bank of America, N.A. requests:

1. That all claims to the funds be determined and adjudicated, and that garnishee be discharged from all liability to the United States of America, Christopher Merhan Sole Prop. d/b/a Christopher Merhan CPA, Christopher Pasive Merhan Sole Prop. d/b/a C.P. Merhan Consulting, Christopher Pasive Merhan, Amanda L. Merhan, and Christopher Merhan, respecting the funds.
2. Such other relief to which garnishee may show itself properly entitled.

Respectfully submitted,

By: /s/ Evan A. Moeller
Evan A. Moeller
State Bar No. 24051067

**ATTORNEY-IN-CHARGE FOR
BANK OF AMERICA, N.A.**

OF COUNSEL:
HIRSCH & WESTHEIMER, P.C.
Bank of America Center
1415 Louisiana, 36th Floor
Houston, Texas 77002
Telephone: (713) 223-5181
Telecopier: (713) 223-9319

VERIFICATION

STATE OF CALIFORNIA §
 §
COUNTY OF LOS ANGELES §

BEFORE ME, the undersigned Notary Public, on this day personally appeared Tranh Vong, who, being by me duly sworn on oath depose and said that he is an Assistant Vice-President of Bank of America, N.A. in the above-entitled and numbered cause; that he has read the above and foregoing Answer to the Writ of Garnishment; and that every statement contained in that document is within his personal knowledge and is true and correct.



Tranh Vong

SUBSCRIBED AND SWORN TO (OR AFFIRMED) BEFORE ME on this 9 day of May, 2014, by Tranh Vong proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Seal:





Notary Public in and for the State of California

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of May, 2014, that a true and correct copy of the foregoing Answer to Writ of Garnishment was sent by certified mail, return receipt requested, to the following persons:

United States Attorney
Southern District of Texas
Attn: Martha Minnis
1000 Louisiana Street, Suite 2300
Houston, TX 77002
CMRRR NO. 7013 2250 0001 3645 1189

Christopher Merhan Sole Prop.
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P.O. Box 133053
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Christopher Pasive Merhan Sole Prop.
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Amanda L. Merhan
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/s/ Evan A. Moeller
Evan A. Moeller